

Defendants.

(continued)

Case No. 10-CV-000753

PETITION TO REVIVE JUDGMENT

NOW COMES Judgment Creditor, Chicago Title Insurance Company, by and through its attorney Yousef K. Sarandah of Fidelity National Law Group, pursuant to Fed.R.Civ.P 69(a) and 735 ILCS 5/2-1602 praying that this Court revive the judgment previously entered in favor of Amalgamated Bank of Chicago (assigned to Chicago Title Insurance Company) and against Defendant, John J. Jellinek, and respectfully states as follow:

1. That on or about May 12, 2010, this Court entered judgment in favor of Amalgamated Bank of Chicago, and against, John J. Jellinek, in the amount of \$5,816,089.40, with prejudgment interest of \$757.02 from May 12, 2010 to the date of entry of this judgment on the docket, and post-judgment interest of 0.39%, calculated pursuant to 28 U.S.C § 1961 (the “Judgment”). A copy of the Judgment is attached hereto as Exhibit A.

2. That on or about July 16, 2013, Amalgamated Bank of Chicago assigned the Judgment to Chicago Title Insurance Company. A copy of the Assignment is attached hereto as Exhibit B.

3. That payments have been made against the Judgment in the amount of \$224,500.00.

4. Said judgment is in full force and is due thereon from the defendant, John J. Jellinek, to Chicago Title Insurance Company the sum of \$5,591,589.40, with prejudgment interest of \$757.02 from May 12, 2010 to the date of entry of this judgment on the docket, and post-judgment interest of 0.39%, calculated pursuant to 28 U.S.C § 1961.

5. A proposed Order for Revival of Judgment is attached hereto as Exhibit C.

WHEREFORE, Judgment Creditor, Chicago Title Insurance Company, as assignee of the Judgment, pursuant to Fed.R.Civ.P 69(a) and 735 ILCS 5/2-1602 prays that the judgment entered on May 12, 2010, in favor of Amalgamated Bank of Chicago and against John J. Jellinek, in the amount of \$5,591,589.40, with prejudgment interest of \$757.02 from May 12, 2010 to the date of entry of this judgment on the docket, and post-judgment interest of 0.39%, calculated pursuant to 28 U.S.C § 1961, be revived.

Dated: January 17, 2019

Respectfully submitted,

Yousef K. Sarandah
Fidelity National Law Group
10 S. LaSalle Street, Suite 2750
Chicago, IL 60603
(312) 223-2734
Attorney No. 6270549

CHICAGO TITLE INSURANCE COMPANY

By: /s/ Yousef K. Sarandah
One of Its Attorneys

The undersigned certifies that the statements set forth herein are true and correct to the best of his knowledge and belief.

/s/ Yousef K. Sarandah
One of Its Attorneys

CERTIFICATE OF SERVICE

I, Yousef K. Sarandah, an attorney, certify that copies of the aforementioned *Petition to Revive Judgment* have been sent to:

John J. Jellinek
2630 Front St.
San Diego, CA 92103

by both regular U.S. Mail and Certified, Return Receipt Requested, on January 17, 2019.

/s/Yousef K. Sarandah